

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-1 Verizon - If a third garage is called when the primary garage and secondary garage yields no takers, how long, on average, does the process of attempting to contact a response crew take?

**REPLY:** The average time to contact a response crew depends on the mix of the three garages called. If three garages are involved in any response, the average callout process time can range from 15 to 30 minutes, depending on which garages are involved.

VZ #46

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-2 Verizon - Is Verizon obligated to go through its call list at a primary or secondary garage if it is generally known that the particular garage has a very low response rate? If yes, is this required even if Verizon has confirmed that an emergency exists and a crew is required?

**REPLY:** Yes – Verizon NH is contractually obligated to go through its call lists to satisfy overtime distribution and assignment of work requirements.

VZ #47

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-3 Verizon - Please provide the location of the second and third Verizon garages (called when the primary garage yields no response) for Verizon's maintenance areas in the capital and seacoast service areas. Please provide the residences (limited to name of town or municipality) of the technicians assigned to these second and third garages. Please provide the driving time between the residences of each of the technicians and the garages to which they are currently assigned.

**REPLY:** Please see the attachment for the garages that serve the Seacoast and Capital maintenance areas as well as the requested information on the technicians assigned to those garages. The garages in these territories serve as the second and third call-out garages in their respective maintenance areas.

VZ #48

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-4 Verizon – Verizon indicated, during the 1/17/06 tech session, that greater than 60% of all calls to its Emergency Response Center (ERC) originate from the electric company. Please indicate in what percent and from whom the remaining calls originate.

**REPLY:** Verizon's Emergency Response Center typically receives 73 percent of its calls from the various Power Companies. Sixteen percent of the calls typically have originated from either Police or Fire Departments, with the predominance from Police Departments. The remaining 11 percent typically have originated from a variety of internal sources such as technicians, supervisors and Maintenance Centers.

VZ #49

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-5 All - If notified by local officials (e.g., police, fire) of an emergency, do you immediately dispatch a crew/technician to the scene? If not, why not? How is the decision made (based on what information) to send appropriate personnel?

**REPLY:** Verizon NH expects immediate response to an emergency. Decisions regarding the appropriate personnel are made based on the damage assessment information provided during the call notification, such as poles or cables down, or by on-site review.

VZ #50

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-8 All – State and municipal emergency personnel direct most of their calls, during pole emergencies, to the electric companies. How might the utilities ensure that emergency personnel contact the Verizon ERC, as well as the electric companies, during these emergencies?

**REPLY:** All utilities have been provided the contact numbers for the Verizon Emergency Response Center for after hour emergencies as well as the contact numbers for local supervision and trouble reporting centers. These are the contact numbers that should be used to report emergencies.

VZ #53

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-9 All -- How do the electric companies, normally first on-scene to a pole emergency, feel about continuing to contact the Verizon ERC with the initial damage assessment if state and emergency personnel include Verizon as one of their initial contacts?

**REPLY:** Verizon NH believes that direct communication between Verizon NH and the Power Companies and/or Police Departments is more efficient. This communication will occur as a matter of the restoral operation. If the Power Companies rely on third party notification to Verizon NH, there is little way to ensure that all of the necessary notifications will have been made, and there is a potential for increased response times.

VZ #54

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:  
Title:**

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-10 PSNH -- PSNH has a local agreement with Verizon in the Rochester/Somersworth area that allows them to set a pole in a Verizon maintenance area after PSNH has contacted Verizon and there is no response by Verizon within two hours. Please supply data that documents how often PSNH used this option in the last 18 months?

**REPLY:** Verizon NH response is not required.

VZ #55



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Troy McDonald

**Title:** Joint Lines Specialist – ME, VT, NH

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-11 All – Would adherence to routines suggested in questions #2-8 & #2-9 eventually eliminate the need for local agreements?

**REPLY:** No. Individual agreements between Verizon and various power companies define the terms and conditions of working relationships beyond those specifically related to emergency response situations. Agreements would need to remain in effect to address the day-to-day inter-company operating procedures related to issues beyond emergency response.

VZ #56

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-13 Verizon - Please confirm that in its response to Staff 1-4, Verizon's reference to the lack of provisions in the contract regarding "paid standby" means that Verizon has no field crews or emergency response personnel on paid standby during nights and emergencies.

**REPLY:** Verizon NH has no field crews or emergency personnel on paid standby during nights or emergencies. Emergency conditions, depending on the scope as contractually defined, can warrant suspension of overtime limitations to ensure adequate personnel are working.

VZ #58

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-14 Verizon - Please confirm that Verizon's response to Staff 1-5 means that Verizon has no supervisory or management personnel on standby during weeknights from 3:00 p.m. until 7:00 a.m., and on weekends. If this is not correct, please provide the number of such supervisory or management personnel.

**REPLY:** Verizon NH has supervisory personnel working "off hours" between 3:00 PM. and 7:00 A.M. in the Emergency Response Center. All field supervisors, while not on paid standby, are expected to be available at any hour for immediate emergency response.

VZ #59

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-15 Verizon - Where is the Verizon Emergency Response Center located?

**REPLY:** The Verizon Emergency Response Center is located at 875 Holt Ave,  
Manchester, NH.

VZ #60

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-16 Verizon - Does Verizon set a limit as to how far a technician may be expected to travel in order to respond to an emergency, before it will excuse that technician from responding and seek another?

**REPLY:** Travel expectations depend on the type of emergency. The practical limit utilized by Verizon NH for pole emergencies, as well as contractual obligations, is the basis for the call-out procedure of the first through third garages within the state. The travel limit varies based on the proximity of the emergency to the first, second or third garages.

Each municipality is served by a corresponding Verizon NH construction garage. In the event of an emergency situation, the ERC will contact the primary garage for response before moving to a second garage, and if need be, a third garage.

VZ #61

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-17 Verizon - Are the supervisors referred to in Verizon's response to Staff 1-7 on standby?

**REPLY:** All field supervisors, while not on paid standby, are expected to be available at any hour for immediate emergency response. ERC managers work regular tours on an off-hour basis and weekends.

VZ #62

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-18 Verizon - Other than maintaining an Emergency Response Center and implementing storm preparedness plan as described in Verizon's response to Staff 1-8, please specify the steps Verizon takes to ensure that an adequate number of technicians are available to provide an "immediate response" to emergency calls.

**REPLY:** In addition to the ERC and implementation of a storm preparedness plan, Verizon NH ensures its work load is covered through adequate staffing. Verizon NH does this by maintaining an annual vacation schedule which implements controls to ensure adequate force is available to cover the needs of the business, including call-outs. Also, Verizon NH monitors training requests and short notice requests for time off to ensure sufficient force is available to cover the needs of the business. At no time are service commitments jeopardized and/or emergency responses delayed due to forecasted vacation and/or training schedules.

VZ #63

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-20 Verizon - Regarding Verizon's response to Staff 1-11, please describe Verizon's understanding of its obligations to respond to an emergency call in (a) an electric utility's maintenance area, and (b) Verizon's maintenance area.

**REPLY:** Verizon NH's response obligations to an emergency call are similar regardless of maintenance area, with the exception that pole emergencies in Verizon NH's maintenance area require the pole set operation to be performed by Verizon.

Also, there is no procedural difference in responding to an emergency call in an electric maintenance area versus Verizon NH's maintenance area. Verizon NH expects immediate response to emergency situations regardless of the maintenance area.

VZ #65



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-21 Verizon – Verizon indicated, during the 1/17/06 tech session, that it has started tracking tech response time to emergencies. Please supply the data collected in the last 18 months.

**REPLY:** Verizon NH began tracking technician response time at the beginning of November 2005 (see Attachment).

VZ #66

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-23 Verizon – Please supply information concerning the October 2005 pole emergency in Rochester where a Verizon line crew dispatched from Augusta, Maine assisted PSNH with a broken pole?

**REPLY:** Verizon NH does not show any record of an October 2005 dispatch in Rochester, New Hampshire involving a crew from Augusta, Maine. Verizon's records indicate two call-outs during October, 2005 in the Town of Rochester. Both call-outs involved PSNH.

The first call-out occurred on October 12<sup>th</sup> on McDuffie Street, Rochester. In this instance, the responding technicians dispatched from the Greenland and Somersworth garages. The technicians' residences were in Kensington and Rochester, New Hampshire, respectively.

The second call-out occurred on October 16<sup>th</sup> on Meadowbrook Road, Rochester. In this instance, the responding technicians dispatched from the Greenland and Somersworth garages. The technicians' residences were in Hampton and Dover, New Hampshire, respectively.

VZ #68

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-24 Verizon - How does Verizon inspect the poles that its technicians have not climbed?

**REPLY:** Verizon NH technicians inspect poles at their work location independent of the need to climb the pole. Details of the inspection process are provided in Staff Set 1-12.

VZ #69

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-25 Verizon - Regarding Verizon response 1-13, please explain how Verizon complies with NESC 214A4 if such records are not maintained in the normal course of business.

**REPLY:** NESC 214A4 requires recording of defects not promptly corrected. Verizon NH replaces defective poles found to be hazardous on an immediate basis. Identification records would include the pole tag process previously outlined in Verizon NH's reply to Staff 1-17 as well as the work order associated with the removal work.

VZ #70

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-26 Verizon - Please provide the actual number of full time employees assigned to pole setting, transfer and removal activities during 2005, broken out by specific garage.

**REPLY:** As stated in Verizon NH's response to Staff 1-27, there is no set number of employees assigned to these functions. The relevant number of employees varies by the work activities and demands each day. There are, however, eight technicians generally assigned to double pole removal work. In 2005, Verizon NH spent approximately 26,000 hours in pole placement activities and approximately 20,000 hours in pole removal activities.

VZ #71

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-28 Verizon - Please provide copies of all written protocols used by Verizon to determine size and location of poles, including but not limited to, priority for installation and repair schedules.

**REPLY:** Please refer to the Attachment for written protocols used by Verizon NH to determine size and location of poles.

Priority is given to repairing damaged facilities of existing customers before the installation of new services to new or existing customers.

VZ #73

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-29 Verizon – Does the ERC require call-backs from the technicians when they arrive on an emergency site? If not, what other means are used to document and track response times?

**REPLY:** The ERC obtains the technician arrival time at the emergency site. The preferred method is for the technician to call upon arrival. The time can be provided after the event upon the technician's return to the garage to close out the work. In the event any data is missed, the local supervisor follows up the following morning with the technician and the ERC.

VZ #74

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-30 All - Please provide for the last six months all documentation associated with keep cost work orders involving the replacement and or repair of poles and conduit due to motor vehicle or construction accidents in New Hampshire. The documentation should include the work order and final billing invoice and clearly identify the incident location, date, crew hours and the charges for time and material. It is requested that the information be provided in chronological order as determined by the specific date of the event causing the damage.

**REPLY:** The attachment lists 287 keep cost work orders involving the replacement and/or repair of poles and conduit due to motor vehicle or construction accidents in New Hampshire. The spreadsheet identifies work orders associated with accidents between August 1, 2005 and January 30, 2006. It identifies the Engineering work order number, wire center, date and location of the accident. For those work orders in which a final billing invoice has been issued, the amount of the final invoice is displayed. A CD containing the billing invoices for 77 work orders which have received final billing invoices is provided separately.

VZ #75



**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-31 Verizon - In response to Staff 1-7, Verizon responded the "The geography area assigned to a supervisor varies by geography and garage location. Generally, Verizon will utilize the primary garage or the nearest two garages to cover an emergency response". Please provide for year 2005 the number of incidents requiring the utilization of resources from other than the primary garage and provide specific detail in regards to incident location and the specific garages involved in the response, including the identification of the garage or garages that could not respond.

**REPLY:** In 2005, there were 137 call-outs in New Hampshire where the ERC used resources from other than the primary garage. Please see Attachment.

VZ #76

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-32 Verizon - In response to Staff 1-25 Verizon provided a chart reflecting the number of assigned digger and placer trucks located in New Hampshire as of December 2005. For year 2005 please provide the actual in service utilization of the New Hampshire fleet broken out by the digger truck and placer truck categories, stated as percent utilized versus theoretical availability. For clarity, the request is seeking the percentage of actual fleet utilization (total assigned capacity less equipment down time)

**REPLY:** In 2005, equipment down-time for the digger vehicles was 3.08% of available time with availability at 96.92%. Equipment down-time for placer vehicles was 3.42% of available time with availability at 96.58%.

VZ #77

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Marianne Ryan  
**Title:** Director - Construction

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-33 In 2005 what percentage of digger truck and placer truck down time was attributed to maintenance and or equipment breakdown versus technician shortage due to incidental absence, vacation, training, long-term disability or other personnel factors?

**REPLY:** See Staff Set 2-32. Vehicle down-time is associated with maintenance issues. There is no down-time attributable to technician shortage. One hundred percent of the available fleet is utilized each day.

VZ #78

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Gloria L. Harrington

**Title:** Manager

**Respondent:** Troy McDonald

**Title:** Joint Lines Specialist – ME, VT, NH

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-34 All - With respect to Staff question 1-19, please identify the steps that are taken to notify a licensing municipality of changes in the field that affect the terms or conditions of the license granted for that specific pole location, including, but not limited to the location of the pole itself.

**REPLY:** With respect to the positioning of new poles: When the need is to replace a pole in a location outside the allowable tolerance granted by issuance of the initial municipal or state pole location permit, Verizon NH would apply to the licensing authority for another location permit to reflect the positioning of a new pole. Based upon positioning data obtained in the field, the Verizon Right-of-Way department completes the appropriate pole location application required by municipal and state licensing authorities and submits for licensing authority approval.

With respect to transfer work performed on poles: Verizon NH notifies all authorized licensees attached to poles, including municipalities, of changes in the field that affect the license granted for a specific pole location in accordance with the terms and conditions specified in Verizon NH's standard Pole Attachment Agreement.

Specifically, Article 7.1.6 states,

If Licensee does not rearrange or transfer its attachments within fifteen (15) days after receipt of written notice from Licensor requesting such rearrangement or transfer and indicating that such pole is ready for rearrangement or transfer by Licensee, Licensor, Joint Owner(s) or Joint User(s) may perform or have performed such rearrangement or transfer, and notwithstanding the

provisions of subpart 7.1.7, Licensee agrees to pay the cost thereof.

VZ #79

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Martin Wilkinson  
**Title:** Manager – OSP Engineering  
**Respondent:** Gloria L. Harrington  
**Title:** Manager

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-35 All - With respect to Staff question 1-37, please state the procedure used within the utility to respond to a notice of removal received from a municipality or the state pursuant to RSA 231:177 through 182 inclusive.

**REPLY:** Upon receipt of notice from a municipality or the state to remove a specific pole(s) from the public ROW, Verizon NH would notify existing attachers and attempt to make reasonable accommodation for their facilities just as Verizon NH would make accommodation for its own facilities. However, it should be noted that Article 2.4 of Verizon's standard pole attachment agreement, specifically states,

Nothing contained in this Agreement shall be construed to require Licensor to construct, retain, extend, place or maintain any pole or other facilities not needed for Licensor's own service requirements.

Set procedures for removal do not exist when notification is received pursuant to RSA 231:177 through 182 inclusive. However, in September 2005 Verizon NH's Right of Way Department received a Notice to Remove Poles Pursuant to RSA 231:177 and following, from the City of Dover. As a result, Verizon's Engineering Department initiated a survey of dual poles in the City of Dover. The survey results were analyzed along with system data to produce a list of construction work orders. The Construction Department has dedicated force to the project of removing the double poles in the City of Dover.

**Verizon New England Inc.  
d/b/a Verizon New Hampshire**

**State of New Hampshire**

**Docket No. DM 05-172**

**Respondent:** Lisa Thorne

**Title:** Vice President – New Hampshire

**REQUEST:** New Hampshire Public Utilities Commission Staff, Set 2

**DATED:** January 25, 2006

**ITEM:** Staff 2-36 All - With respect to Staff question 1-1, please identify whether, at any time covered by data requests in this proceeding, the Commission has ordered specific emergency response procedures to be implemented, and if so how the costs of such implementation are recovered.

**REPLY:** Verizon NH is not aware of any specific emergency response procedures ordered by the Commission.

VZ #81